

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA
Civil Action No.: 1:23-cv-00423-WO-JLW

TIMIA CHAPLIN, KEVIN SPRUILL,
ROTESHA MCNEIL, QIANA ROBERTSON,
YOUSEF JALLAL, MESSIEJAH BRADLEY,
PAULINO CASTELLANOS, ROBERT LEWIS
AND ALLEN SIFFORD, on behalf of
themselves and all others
similarly situated,

Plaintiffs,

v.

WILLIE R. ROWE, in his capacity as
Sheriff of Wake County, BRIAN
ESTES, in his official capacity as
the Sheriff of Lee County, THE
OHIO CASUALTY INSURANCE COMPANY,
as the surety for the Sheriff of
Wake County and as surety for the
Sheriff of Lee County, TYLER
TECHNOLOGIES, INC., NORTH CAROLINA
ADMINISTRATIVE OFFICE OF THE
COURTS, RYAN BOYCE, in his
official capacity as the Executive
Director of the North Carolina
Administrative Office of the
Courts, BRAD FOWLER, in his
official capacity as the ecourts
Executive Sponsor and Chief
Business Officer of the North
Carolina Administrative Office of
the Courts, BLAIR WILLIAMS, in his
official capacity as the Wake
County Clerk of Superior Court,
SUSIE K. THOMAS, in her official
capacity as the Lee County Clerk
of Superior Court, JOHN DOE

TYLER TECHNOLOGIES, INC.'S
CONSENT MOTION FOR EXTENSION
OF TIME TO REPLY TO
PLAINTIFFS' RESPONSE IN
OPPOSITION TO TYLER
TECHNOLOGIES, INC.'S MOTION
TO DISMISS LOCAL RULE 23.1

SURETY, as the surety for the Wake
County Clerk of Superior Court and
the Lee County Clerk of Superior
Court, and DOES 1 THROUGH 20,
INCLUSIVE,

Defendants.

Pursuant to Local Rule 6.1(a) and Rule 6(b) of the Federal Rules of Civil Procedure, Defendant Tyler Technologies, Inc. ("Tyler Technologies"), moves this Court for an extension of time, through and including June 7, 2024, to file its Reply brief to Plaintiffs' Response in Opposition to Tyler Technologies, Inc.'s Motion to Dismiss ("Response"). In support of this motion, Tyler Technologies states the following:

1. Plaintiffs filed their original complaint on May 23, 2023.
2. Tyler Technologies timely filed its Motion to Dismiss the Complaint on September 20, 2023.
3. Plaintiffs filed their First Amended Complaint on October 27, 2023.
4. Tyler Technologies timely filed its Motion to Dismiss the First Amended Complaint on January 16, 2024.

5. Plaintiffs filed their Second Amended Complaint on February 28, 2024.

6. Tyler Technologies timely filed its Motion to Dismiss the Second Amended Complaint on April 9, 2024.

7. Plaintiffs' filed their Response to Tyler Technologies' Motion to Dismiss the Second Amended Complaint on May 7, 2024.

8. The time within which Tyler Technologies must file its Reply brief to the Response has not expired.

9. Tyler Technologies requests that the deadline to file its Reply to Plaintiffs' Response be extended by ten days, to and through June 7, 2024, in order to allow Tyler Technologies to respond to Plaintiffs' arguments raised in their Response. Such an extension will allow for more efficient briefing on Tyler Technologies' Motion to Dismiss the Second Amended Complaint. Such an extension is justified because (1) the original deadline for the Reply of May 28, 2024 falls the day after the Memorial Day Weekend, when counsel and clients will be traveling and on vacation; and (2) counsel has various client obligations

that will make it challenging to file the Reply brief by the original deadline.

10. This Motion is made in good faith and not for the purpose of undue delay.

11. Tyler Technologies' counsel has conferred with the Plaintiffs' counsel, and Plaintiffs' counsel consents to the requested extension.

12. Tyler Technologies reserves all defenses, claims and arguments.

WHEREFORE, Tyler Technologies respectfully requests the Court extend Tyler Technologies' deadline to file its Reply to Plaintiffs' Response by ten (10) days, through and including June 7, 2024.

[Signature on Following Page]

This 13th day of May, 2024.

s/ Gregory L. Skidmore
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